# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,<sup>1</sup> et al.,

Debtors.

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING CORPORATION,

Debtor

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

PROMESA Title III

No. 17 BK 3284-LTS

MOTION TO INFORM APPEARANCE OF LEHMAN BROTHERS HOLDINGS, INC., AS PLAN ADMINISTRATOR FOR LEHMAN BROTHERS SPECIAL FINANCING, INC. AT HEARING SCHEDULED FOR NOVEMBER 20, 2018 AT 10:30 AM (AST)

### TO THE HONORABLE COURT:

Lehman Brothers Holdings, Inc., as Plan Administrator for Lehman Brothers Special Financing, Inc. ("Lehman"), by and through its undersigned counsel, hereby submits this

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

informative motion in compliance with this Court's *Order Regarding Procedures for Attendance*, *Participation and Observation of the November 20, 2018 Hearing* (the "Scheduling Order") [Docket # 327 in Case No. 17-3284] and respectfully state as follows:

- 1. Walter Benzija, Esq, and Debra J. Cohen, Esq. of Halperin Battaglia Benzija, LLP will appear in person on behalf of Lehman at the hearing scheduled for November 20, 2018 at 10:30 a.m. (Atlantic Standard Time) in Courtroom 17C of the United States District Court for the Southern District of New York regarding Puerto Rico Sales Tax Financing Corporation's Motion for Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots and Election Notices, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting and Election Deadlines, and (VIII) Approving Vote Tabulation Procedure [Docket No. 307 in Case No. 17-3284] and the Objection of Lehman Brothers Holdings, Inc. as Plan Administrator for Lehman Brothers Special Financing, Inc. to the Disclosure Statement [Docket No. 323 in Case No. 17-3284].
- 2. Lehman reserves the right to respond, as necessary, to any statements made at the Hearing or otherwise by any party in connection with the above captioned Title III case.

WHEREFORE, for the foregoing reasons, Lehman respectfully requests that this Honorable Court take notice of its compliance with the Scheduling Order.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this  $14^{th}$  day of November 2018.

WE HEREBY CERTIFY that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the US Trustee and to all those parties registered to receive notice within the electronic notification service.

#### C. CONDE & ASSOC.

By:/s/ Carmen D. Conde Torres Carmen D. Conde Torres USDC No.: 207312

/s/ Luisa S. Valle Castro Luisa S. Valle Castro USDC No.: 215611

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And

## HALPERIN BATTAGLIA BENZIJA, LLP

By: /s/ Walter Benzija

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